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June 25, 2019

Hon. Marianne O. Battani
United States District Court for the Eastern District of Michigan
231 W. Lafayette Blvd, Courtroom 250
Detroit, MI 48226

Re: *In re Auto Parts Antitrust Litigation*, No. 2:12-md-02311 – Amended
Unopposed Notice Motion and Motions for Preliminary Approval

Dear Judge Battani:

End-Payor Plaintiffs have filed revised documents for the Round 4 Notice Program. End-Payor Plaintiffs appreciate the Court's prompt attention to both the Amended Unopposed Notice Motion and the outstanding motions for preliminary approval of included settlements:

- Delphi (*In re: Ignition Coils*, 13-cv-01403, Dkt. 224);¹
- Mikuni (*In re: Fuel Injection Systems*, 13-cv-02203, Dkt. 383; *In re: Valve Timing Control Devices*, 13-cv-02503, Dkt. 248);
- Sanoh (*In re: Automotive Steel Tubes*, 16-cv-04003 & 16-cv-12949, Dkt. 107).

The Amended Unopposed Notice Motion contains the following changes from the previously submitted version:

- The Panasonic Defendants include both Panasonic Corporation and Panasonic Corporation of North America;

¹ In order to make the Delphi settlement effective, the Court will also need to so-order the stipulation allowing End-Payor Plaintiffs to file the Third Consolidated Amended Class Action Complaint in *In re: Ignition Coils*. See 2:13-cv-01403, Dkt. 219.

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- The Panasonic class period end date is March 11, 2019;
- The Toyoda Gosei Defendants include TG Missouri Corp.;
- The Toyoda Gosei Brake Hoses class period start date is February 1, 2004;
- The Switches docket number is listed as 2:13-cv-01303;
- The Notice Plan and the Long Form Notice list the Reorganized TK Holdings Trust;
- The Notice Motion and Long Form Notice contain reference to the Takata Corp. settlement reached in the Japanese bankruptcy proceedings;
- The documents include the settlement with Mikuni Corporation in the Fuel Injection Systems and Valve Timing Control Devices cases;
- The documents include the settlement with Delphi Technologies PLC and Delphi Powertrain Systems, LLC in the Ignition Coils case;
- The documents make clear that eligibility is based upon state of residence (or, for businesses, principal place of business) at the time of purchase;
- The Notice Plan is revised to (a) add additional social media outreach targeted at younger audiences, and (b) make clear that some of the television media purchases will be on streaming platforms, which should reach younger audiences; and
- Additional minor edits for clarity and consistency.

As a reminder, the current schedule requires approval by June 30, 2019, for End-Payor Plaintiffs to adhere to the proposed schedule.

Respectfully,



Lucas Issacharoff

cc: Counsel of Record